

AMENDED EXCEPTION 157**BellSouth OSS Testing Evaluation**

BellSouth Response:

BellSouth does follow its software testing and quality process. BellSouth's criteria for implementation of an Encore release include the following:

- Completion of at least 98% of System, Performance and Regression testing
- 97% test case pass rate
- No Severity 1 defects outstanding
- No Severity 2 defects outstanding that do not have a path forward for completion and do not have mechanized workarounds.

Our statistics on these objectives for Releases 10.2 and 10.3 were as follows:

Criteria	10.2 Results	10.3 Results
98% test completion	100%	99.9%
97% test cases passed	97.93%	98.66%
# Severity 1 defects outstanding	0	0
# Severity 2 defects outstanding	1	1

There were ten (10) defects cited as having resulted from Release 10.2 testing that were carried forward into production. Investigation into those specific defects has shown that although these defects were opened after the implementation of Release 10.2 on 11/3/01, most of these actually resulted from features implemented in prior releases as early as 8/30/01, but not detected. As indicated by the matrix below, all defects have been corrected and all were corrected in the intervals defined by the CCP process for the impact type. (See above tables for BellSouth's response to each specific issue associated with the 10.2 and 10.3 Releases.)

Impact	Defects Corrected	Scheduled with 10.4	Scheduled with 10.5	CCP Interval for Correction	Interval Met
High	2			10 business days	2
Medium	3			90 business days	3
Low	5			Best effort	5

There were thirty-one (31) defects cited as having resulted from 10.3 testing that were carried forward into production. Eight (8) of these defects were found in Release 10.3 system testing, all were considered to be of low impact and all were scheduled for correction and were in fact implemented in Release 10.3.1 on 2/2/02. Six (6) of these defects were found in Release 10.3.1 system testing, all were considered to be of low impact, one was corrected before release implementation, and the remaining five (5) are scheduled for implementation in Release 10.4. As indicated by the matrix below, all

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defects cited have been corrected or are already scheduled and have or will meet the intervals defined by the CCP process for the impact type.

Impact	Defects Corrected	Scheduled with 10.4	Scheduled with 10.5	CCP Interval for Correction	Interval Met
High	0			10 business days	
Medium	2	4		90 business days	6
Low	15	8	2	Best effort	25

BellSouth's goal is to allow sufficient time for appropriate pre-release testing within the release schedule. BellSouth's testing cycle includes unit/product testing, system/integration testing, performance testing, regression testing and user acceptance testing. Due to the number and/or complexity of features implemented in our Encore releases, testing is always a challenge. The amount of time required for testing increases with each major release. As an example, Release 10.2 tested 823 new feature test cases and 2,126 regression test cases. Release 10.3 tested 1,938 new feature test cases and 3,062 regression test cases - an increase of 2,051 test cases. BellSouth mitigates these risks in a variety of ways, including more test case automation and, where required, an increase in trained testing personnel. In addition, lessons learned from each of our releases are being implemented, such as the sharing of test cases between vendors and a two-phased approach to performance testing as technology changes, are introduced.

KPMG also cites a backlog of sixty-one (61) defect change requests as of January 22, 2002. A March 5, 2002 analysis reveals a backlog of only thirty-eight (38) system defects and twenty-two (22) documentation defects as shown in the matrix below:

System Defects	
Scheduled for Implementation	23
Targeted by Release 10.6	8
New	4
Pending Clarification	3
Documentation Defects	
Scheduled	21
Targeted by Release 10.6	1

BellSouth is committed to providing our customers with new functionality in our applications in a timely manner with high quality standards.

BellSouth Amended Response:

An updated analysis, shown in the matrix below, reveals that BellSouth has already implemented the documentation defect that was indicated as "Targeted by Release 10.6."

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System Defects	
Scheduled for Implementation	23
Targeted by Release 10.6	8
New	4
Pending Clarification	3
Documentation Defects	
Scheduled	21

KPMG Consulting Amendment:

KPMG Consulting's observation of BellSouth's Release 10.5 noted that there were significant defects in the software when releases were placed into the production environment. Specific defects included:

CR 0802	LMU via LENS experiencing COG API 0003 errors (high impact)
CR 0803	LSRs receiving COP API 0003 error if TAG API prior to 7.7 is used (medium impact)
CR 0804	LMU unable to reserve specific cable and pair Migration LSR's using LNA of G Defect (high impact)
CR 0805	REQTYP M LSR's auto-clarifying on MFB USOC's LSR's auto-clarified for WSOP when address has working QuickServ Defect (medium impact)
CR 0806	LENS loses data at times on secondary feature details on LNA if details have a space (medium impact)
CR 0807	Sups submitted on XDSL LSRs where initial pass of the LSR was prior to release 10.5 and required exception management, were routed to wrong exception management tool (high impact)
CR 0808	Reject not being received when orders submitted with invalid CC/PON/VER (medium impact)
CR 0810	LENS - on new locations with no prior services, LENS may supply the wrong address validation at times (medium impact)
CR 0811	PD status from order generated manually caused system to start new order flow (high impact)

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CR 0812	CP status not being sent sporadically on UDC, EEDs and XDSL orders (high impact)
CR 0813	Jack USOC non-basic wiring defect (medium impact)

Impact:

BellSouth's incomplete internal software testing may affect a CLEC's ability to efficiently execute transactions with BellSouth, resulting in CLEC customer dissatisfaction.

ATTACHMENT 18

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS



encDocUserReq
ENC21046.DOC

ENCORE User Requirements for UNE-P Call Scope Changes

**Final
ENC21046.DOC
Version 6.0
April 30, 2002**

1. SCOPE

2.1 Business Implications

2.1.1 Current Process

Current Process	
•	Currently, when converting Retail/Resale to UNE-P, the correct LNECLSSVC is not always populated on the conversation.
•	
•	
•	

2.1.2 Expected Process

Expected Process	
•	With implementation of this feature, conversions from Retail/Resale lines to UNE-P will result in the correct LNECLSSVC USOC being populated.
•	Add new USOCS to UNE-P Table.
•	

2. USER REQUIREMENTS

Requirement No.	User Requirement
UR21046.0001	This requirement is applicable to TCIF 9.
UR21046.0010	This requirement is applicable to REQ TYP M.
UR21046.0020	Deleted
UR21046.0020a	Deleted
UR21046.0020b	Deleted
UR21046.0025	Deleted
UR21046.0030	Deleted
UR21046.0040	When an LSR is submitted, LNA=N, the Line Class of Service (LNECLSSVC) Field is Required.
UR21046.0050	When an LSR is submitted, LNA=N, and the LNECLSSVC Field is blank, the system will return the following error message, "LNECLSSVC REQUIRED FOR LNA=N."
UR21046.0060	When an LSR is submitted, LNA = W or P, the system will convert the current USOC to the UNE LNECLSSVC USOC listed in Attachment I and II by state and populate the USOC on the service order.
UR21046.0062	When an LSR is submitted, LNA = W or P, the LNECLSSVC is prohibited.
UR21046.0062a	When an LSR is submitted, LNA = W or P, and the LNECLSSVC is populated, the system will return the following error message. "LNECLSSVC PROHIBITED WITH LNA = W or P."
UR21046.0063	When an LSR is submitted on a Residence account, 1 st character of TOS =2, the system will verify that the LNECLSSVC Field is populated with a LNECLSSVC USOC listed in Attachment I by state, and if found, continue processing the request.
UR21046.0063a	When an LSR is submitted on a Residence account, 1 st character of TOS =2, the system will verify that the LNECLSSVC Field is populated with a LNECLSSVC USOC found in Attachment I by state, and if NOT found, the system will return the following error message. "INVALID LNECLSSVC FOR TOS."
UR21046.0064	When an LSR is submitted on a Business account, 1 st character of TOS =1, the system will verify that the LNECLSSVC Field is populated with a LNECLSSVC USOC found in Attachment II by state, and if found, continue processing the request.
UR21046.0064a	When an LSR is submitted on a Business account, 1 st character of TOS =1, the system will verify that the LNECLSSVC Field is populated with a LNECLSSVC USOC found in Attachment II by state, and if NOT found, the system will return the following error message. "INVALID LNECLSSVC FOR TOS."
UR21046.0065	Deleted

Requirement No.	User Requirement												
UR21046.0067	Deleted												
UR21046.0070	When an LSR is submitted for ACT= V, P, or Q, and the LNECLSSVC Field is not populated, the system will convert the current USOC to the UNE LNECLSSVC USOC listed in Attachment I and II by state and populate the USOC on the service order.												
UR21046.0075	Deleted.												
UR21046.0080	When an LSR is submitted for ACT= W, the system will convert the current USOC to the UNE LNECLSSVC USOC listed in Attachment I and II by state and populate the USOC on the service order.												
UR21046.0090	Renumbered as UR21046.0170												
UR21046.0100	Renumbered as UR21046.0180												
UR21046.0110	Deleted												
UR21046.0120	Deleted												
UR21046.0130	Deleted												
UR21046.0140	Deleted												
UR21046.0150	Deleted												
UR21046.0160	Deleted												
UR21046.0165	<p>When an LSR is submitted on a Residence Account and a Caller ID USOC from the list below is present in the Feature Detail Field, the system will verify that either:</p> <ol style="list-style-type: none">1. the LNECLSSVC Field is populated with one of the LNECLSSVC with Caller ID USOC in Attachment I, or2. the LNECLSSVC is blank and the USOC is migrating to to a Caller ID USOC in Attachment I for ACT = V, P, Q or,3. the LNECLSSVC is blank and the existing Category ‘D’ USOC is a Caller ID USOC in Attachment I, for ACT = C. <p>If true, continue processing the service order.</p> <p style="text-align: center;"><u>Caller ID USOCs</u></p> <table><tr><td>NSD</td><td>NSDCR</td><td>NSDMN</td><td>N1ACR</td></tr><tr><td>NXM</td><td>NXECR</td><td>NXEWX</td><td></td></tr><tr><td>NXMMN</td><td>NXMCR</td><td>NCACR</td><td></td></tr></table>	NSD	NSDCR	NSDMN	N1ACR	NXM	NXECR	NXEWX		NXMMN	NXMCR	NCACR	
NSD	NSDCR	NSDMN	N1ACR										
NXM	NXECR	NXEWX											
NXMMN	NXMCR	NCACR											
UR21046.0166	<p>If the conditions in Requirement UR21046.0165 are not met, return the following error message:</p> <p>“INVALID LNECLSSVC USOC”</p>												

Requirement No.	User Requirement												
UR21046.0167	<p>When an LSR is submitted on a Business Account and a Caller ID USOC from the list below is present in the Feature Detail Field, the system will verify that either:</p> <ol style="list-style-type: none">1. the LNECLSSVC Field is populated with one of the LNECLSSVC with Caller ID USOC in Attachment II, or2. the LNECLSSVC is blank and the USOC is migrating to to a Caller ID USOC in Attachment II for ACT = V, P, Q or,3. the LNECLSSVC is blank and the existing Category 'D' USOC is a Caller ID USOC in Attachment II, for ACT = C. <p>If true, continue processing the service order.</p> <p style="text-align: center;"><u>Caller ID USOCs</u></p> <table><tr><td>NSD</td><td>NSDCR</td><td>NSDMN</td><td>N1ACR</td></tr><tr><td>NXM</td><td>NXECR</td><td>NXEWX</td><td></td></tr><tr><td>NXMMN</td><td>NXMCR</td><td>NCACR</td><td></td></tr></table>	NSD	NSDCR	NSDMN	N1ACR	NXM	NXECR	NXEWX		NXMMN	NXMCR	NCACR	
NSD	NSDCR	NSDMN	N1ACR										
NXM	NXECR	NXEWX											
NXMMN	NXMCR	NCACR											
UR21046.0168	<p>If the conditions in Requirement UR21046.0167 are not met, return the following error message:</p> <p>“INVALID LNECLSSVC USOC”</p>												

Requirement No.	User Requirement
UR21046.0170	<p>The system will add the following <i>NEW</i> Residence USOCs to the existing table for REQ TYP M:</p> <p>NEW RESIDENCE USOCs</p> <p>State</p> <p>Description</p> <p>UNE LNECLSSVC USOC</p> <p>AL Alabama Extended Local Dialing Parity Port without Caller ID Capability UEPWA</p> <p>FL Florida Extended Dialing Port With Caller ID Capability and CREX7 UEPA1</p> <p>FL Florida Extended Dialing Port Without Caller ID Capability and CREX7 UEPA8</p> <p>FL Florida Area Calling Without Caller ID Capability UEPA9</p> <p>GA Port Without Caller ID Capability UEPWC</p> <p>GA Port With Caller ID Capability UEPWQ</p> <p>GA Out Going Only Port UEPWR</p> <p>KY Kentucky Extended Local Dialing Parity Port Without Caller ID Capability UEPWE</p> <p>LA Louisiana Extended Local Dialing Parity Port Without Caller ID Capability UEPWG</p> <p>LA Louisiana Area Plus Without Caller ID Capability UEPRQ</p> <p>MS</p>

Requirement No.	User Requirement
UR21046.0180	<p>The system will add the following <i>NEW</i> Business USOCS to the existing table for REQ TYP M:</p> <p style="text-align: center;">NEW BUSINESS USOCS</p> <p style="text-align: center;">State Description UNE LNECLSSVC USOC</p> <p style="text-align: center;">AL Alabama Extended Local Dialing Parity Port without Caller ID Capability UEPWB</p> <p style="text-align: center;">GA Port Without Caller ID Capability UEPWD</p> <p style="text-align: center;">GA Port With Caller ID Capability UEPWP</p> <p style="text-align: center;">KY Kentucky Extended Local Dialing Parity Port Without Caller ID Capability UEPWF</p> <p style="text-align: center;">LA Louisiana Extended Local Dialing Parity Port Without Caller ID Capability UEPWH</p> <p style="text-align: center;">LA Louisiana Business Area Calling Port Without Caller ID UEPBA</p> <p style="text-align: center;">MS Mississippi Extended Local Dialing Parity Port Without Caller ID Capability UEPWK</p> <p style="text-align: center;">SC South Carolina Extended Local Dialing Parity Port Without Caller ID Capability UEPWM</p> <p style="text-align: center;">SC South Carolina Business Area Calling Port Without Caller ID UEPBB</p> <p style="text-align: center;">TN Tennessee Extended Local Dialing Parity Port Without Caller ID Capability UEPVC</p>

Requirement No.	User Requirement
UR21046.0190	When an LSR is submitted on a Residence Account without Caller ID (Caller ID USOCs are listed in UR21046.0165), the system will validate that the LNECLSSVC is populated with one of the LNECLSSVC without Caller ID USOC in Attachment I, and if found, continue processing the service order.
UR21046.0200	When an LSR is submitted on a Residence Account without Caller ID (Caller ID USOCs are listed in UR21046.0165), the system will validate that the LNECLSSVC is populated with one of the LNECLSSVC without Caller ID USOC in Attachment I, and if NOT found, return the following error message. "INVALID LNECLSSVC USOC."
UR21046.0210	When an LSR is submitted on a Business Account without Caller ID (Caller ID USOCs are listed in UR21046.0167), the system will validate that the LNECLSSVC is populated with one of the LNECLSSVC without Caller ID USOC in Attachment II, and if found, continue processing the service order.
UR21046.0220	When an LSR is submitted on a Business Account without Caller ID (Caller ID USOCs are listed in UR21046.0167), the system will validate that the LNECLSSVC is populated with one of the LNECLSSVC without Caller ID USOC in Attachment II, and if NOT found, return the following error message. "INVALID LNECLSSVC USOC."
UR21046.0230	Deleted
UR21046.0240	Deleted
UR21046.0250	When an LSR is received on an existing Residence Account without Caller ID (with the absence of one of the Caller ID USOCs in UR21046.0165) and the Category 'D' USOC on the CSR is a Port With Caller ID, the system will change the Category 'D' USOC to the corresponding USOC without Caller ID found in Attachment I by state.
UR21046.0260	When an LSR is received on an existing Business Account without Caller ID (with the absence of one of the Caller ID USOCs in UR21046.0167) and the Category 'D' USOC on the CSR is a Port With Caller ID, the system will change the Category 'D' USOC to the corresponding USOC without Caller ID Attachment II by state.
UR21046.0270	The DDC (Due Date Calculator) will use existing functionality for calculating DD (Due Date) for the new USOCs listed in UR21046.0170 & 0180 as it does today for non-complex REQTYP M.
UR21046.0280	When an LSR is received, ACT = C, to add USOC NCACR or N1ACR, calculate the due date using the Feature Exception Interval.
UR21046.0290	When a SUP 03 "All Other Changes," is received, and there is an addition of Feature Activity = N, with LNA of C or V with features NCACR or N1ACR populated in the Feature Detail of the LSR, the system will consider the LSR as having "Significant Changes for Due Date Purposes."



encDocUserReq
ENC21046.DOC

ATTACHMENT 19

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

To:

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michael.britt@lecstar.com; mdelorenzo@kpmg.com;
mnoshay@idstelcom.com; BSTCarrier@birch.com;
john.c.moran@wcom.com

Subject:

ID: RE: CR 756 UNE P changes = Summary of CCP call 6/3 at 2:30 PM



SEND



RE: CR 756 UNE P
changes = Sum...



AT6_12.DOC

To: Tara.Odems@allegiancetelecom.com; TAYLORJG@LCI.COM;
 taziz@epicus.com; TChowaniec@dcaweb.net; tfry@commsouth.net;
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 Zachary.Baudoin@KMCTELECOM.com; Sandra.Hendricks@PaeTec.com;
 Heather.Thompson2@allegiancetelecom.com; CoDavis@covad.com;
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Cc: Dennis.L.Davis@bridge.bellsouth.com;
 Valerie.Cottingham@bridge.bellsouth.com;
 Jim.Maziarz@bridge.bellsouth.com

Subject: RE: CR 756 UNE P changes = Summary of CCP call 6/3 at 2:30 PM

Hello Martha-Sue:

Glad you were able to join us today. Given this was the first CCP call/meeting that I recall you attending, I have to say that I am disappointed that you didn't address your CLEC customers in general as well as those who escalated this CR756 to you, specifically.

Maybe you can address the CLEC community at the next meeting you attend as AT&T would surely like, as I am sure all CLECs would like, to hear your view on the current state of BST CCP.

Please be sure that the minutes of our call today, June 3rd, reflect the following:

1. CLECs (AT&T, WorldCom, ITCDeltaCom, Ztel & Birch) voted to go ahead with CR756 in Rel 10.6 which has now moved from July until August 24, 2002 with the following caveats because BST would not provide another date in 2002 for its implementation:

- a. BST will alter CR756 to reflect that only the MS Changes ordered by the MS PSC are Type 2 (Reg)
- b. BST will alter CR756 to reflect that all others changes listed in the other 8 states are classified as Type 6 (Defects)
- c. BST will note that CLECs want these Defects noted as "High Impact". BST wants to make them "Medium".
- d. BST will roll this code under CR756 into CAVE for CLEC testing as CLECs are still very concerned about the code BST will deliver
- e. BST will communicate any issues identified during testing of this software to CLEC community

2. Latest BST concerning revelation: all line conversions to UNE P from BST retail require that BST establish a new port even with the use of the RRSO FID which was provided July 18, 2001 as THE way that BST would relate the BST D and N Service Orders as well as re-use facilities so as to

avoid the loss of dial tone to end users. Today LCSC staff explained that this FID was to only relate the D & N order which is NOT what CLECs were told last summer.

3. Given the explanation today that the RRSO FID ONLY related orders, WHAT advantage does the Single C in GA, FL, MS and AL give my end user?
4. Given the delay of Rel 10.6, when will BST implement the Single C in the remaining 5 BST states
5. BST to redistribute list of 24 switches that require equipment changes as these are the switches the potential exists for service disruption to CLEC end users upon conversion to UNE P for which the CLEC is blamed, not BST.
6. BST to distribute revised user requirements based on answers provided to CLECs
7. BST to provide additional explanation as to when and why BST does not follow IntraLATA PIC as on LSR?
 - a. DA calls via OLNS are routed to BST's intraLATA when CLECs expect them to go to CLEC LPIC on LSR
 - b. Land to Mobile NXX
 - c. when BST is listed on CSR as LPIC even though CLEC sent themselves as LPIC - Is BST human error only reason for this occurrence?
8. BST to provide revised User Requirements for this CR756. When?
9. BST to communicate exactly what CREX7 in FL provides. What % of BST FL customers have this CREX7?
10. BST - please provide additional explanation to demonstrate how BST routes IntraLATA Toll calls (LPIC = 1+ calls) to the LPIC as submitted on the LSR in 8 other states, excluding GA. The answer BST provided to AT&T today, June 3rd, only addresses Local calling (7 & 10 digit) not BST's intraLATA Toll. Also need to better understand how BST's routing of CLEC expected 1+ IntraLATA calls as local impacts CLEC ODUF and ADUF files.

CLECS - Did I forget anything?

Sincerely,

Bernadette Seigler
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So. Region OSS Interconnection
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Pager: 888-858-7243 Pin: 125159
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DiBona-Russo, Pompea

From: Change.Control@bridge.bellsouth.com
Sent: Wednesday, June 12, 2002 5:29 PM
To: Alan.Flanigan@twtelecom.com; alee@epicus.com;
alejandro@amexcomm.com; amanda.hill@wcom.com;
Annette.Cook@espire.net; Annette.Hardy@accesscomm.com;
Lynn.Arthur@BellSouth.com; avincent@communitytelephone.com; bbil@4pra.com; bellsouth@nightfire.com; beverly.lockwood@btitele.com;
BHughes@nwp.com; Bill.York@wcom.com; billg@telcordia.com;
bmurdo@KMCTELECOM.com; Bob.Buerrosse@allegiancetelecom.com;
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Cecere.Chris@broadband.att.com; cecilia.ortiz@adelphiacom.com;
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changecontrol.bellsouth@onepointcom.com; cheryl@eatel.com;
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clarson@dset.com; colleen.e.sponseller@wcom.com;
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Craig@excleron.com; cschneider@concretio.com; CSoptic@birch.com;
daddymax@netbci.com; daisy.ling@wcom.com;
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desiree@communitytelephone.com; dfoust@deltacom.com;
dkane@aspiretelecom.com; DNapovanice@birch.com;
dnathanson@natelcomm.com; don@amexcomm.com;
donaldsond@epb.net; donna.poe@knology.com; dpetry@ix.netcom.com;
Cain, Donna - NCAM; Dwight.Scrivener@wcom.com;
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ESingleton@eztalktelephone.com; evdoty@nextlink.com; eyu@talk.com;
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Fred.Brigham@wcom.com; Gary@CSII.net; generalg@cris.com;
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Jan.Dumas@accesscomm.com; jason@basicphone.org;
jayala@rhythms.net; jbritton@phonesforall.com; Jdavid4715@aol.com;
JDuffey@PSC.STATE.FL.US; jeanacherubin@yahoo.com;
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Bernadette,
CLECs,

Attached are the responses to your email regarding the June 3 meeting on
CR0756 - UNE-P Call Scope Changes.

Please let us know if you have questions.

Thanks,

Change Management Team

_____ Distributed Message _____

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP, send a message to
list.manager@bridge.bellsouth.com with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

DiBona-Russo, Pompea

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CR0756 – UNE-P Call Scope Changes
Responses to AT&T Questions Submitted 6-4-02

1. CLECs (AT&T, WorldCom, ITCDeltaCom, Ztel & Birch) voted to go ahead with CR756 in Release 10.6, which has now moved from July until August 24, 2002 with the following caveats because BST would not provide another date in 2002 for its implementation:

- a. BST will alter CR756 to reflect that only the MS Changes ordered by the MS PSC are Type 2 (Reg)
- b. BST will alter CR756 to reflect that all others changes listed in the other 8 states are classified as Type 6 (Defects)
- c. BST will note that CLECs want these Defects noted as "High Impact". BST wants to make them "Medium".
- d. BST will roll this code under CR756 into CAVE for CLEC testing, as CLECs are still very concerned about the code BST will deliver
- e. BST will communicate any issues identified during testing of this software to CLEC community

BST Response:

- A & B. Based on CLEC comments, CR0756 has been classified as a Type 2/6. BST/CLECs agreed to disagree on the classification of CR0756. BST views CR0756 as a Type 2 only.
- C. BST has noted on the change request that the CLECs view the other changes as High Impact defects. BST acknowledged that if these other changes were defects, they would probably be assessed as Medium Impact defects. After further review, BST's position is that this feature is not a defect; therefore no impact classification is appropriate.
- D. CR0756 will be available for testing in CAVE.
- E. BST will communicate defects that are found in testing and will not be corrected prior to production.

2. Latest BST concerning revelation: all line conversions to UNE P from BST retail require that BST establish a new port even with the use of the RRSO FID which was provided July 18, 2001 as THE way that BST would relate the BST D and N Service Orders as well as re-use facilities so as to avoid the loss of dial tone to end users. Today LCSC staff explained that this FID was to only relate the D & N order which is NOT what CLECs were told last summer.

BST Response:

The scenario that was discussed during the meeting did NOT involve all lines converting to UNE-P. The scenario MCI posed was a conversion from, for example, BellSouth retail Area Plus to a basic UNE-P service that replicates the 1FR service. The question was, does such a conversion to a non-equivalent UNE-P port require the physical switch port to change. The answer is no, with the exception of conversions from a non-caller id supported BellSouth retail service to a caller is capable UNE-P port in the following switches:

AL: BHAM-HOMEWOOD DS0, HUNTS-UNIVERSITY DS0, MOBL-SEMMES DS0, MOULTON DS0

FL: BCRT BOCA TEECA DS0, DYBH-PORT ORANGE DS0, GULF BREEZE DS0, JCVL-NORMANDY DS0, JCVL-SAN JOSE 73E, LYNNHAVEN DS0, MIAM AIRPORT DS0, NDAD GOLDEN GLADES DS0, PANAMA CITY MAIN DS0, PNSC-WARRINGTON DS0

LA: BT.RG.-OAK HILLS DS0, BT.RG.-WOODLAWN DS0

**CR0756 – UNE-P Call Scope Changes
Responses to AT&T Questions Submitted 6-4-02**

MS: GNWD MAIN DS0

**NC: CHERRYVILLE-CENTRAL 435, ENKA-MAIN 66F, LUMBERTON-MAIN 73F, SELMA-MAIN 96F,
SPRUCE PINE-MAIN 76F, WAYNESVILLE-MAIN 45F**

SC: SUMMERVILLE MA 87E

3. Given the explanation today that the RRSO FID ONLY related orders, WHAT advantage does the Single C in GA, FL, MS and AL give my end user?

BST Response:

With Single C, there will be one single order rather than two, which could cause orders to be separated. Last year, edits were put in place to assist the LCSC service representatives in placing the RRSO FID on the D and N to keep the orders from getting separated. With Single C, RRSO will not be needed because only a single service order will be issued.

4. Given the delay of Release 10.6, when will BST implement the Single C in the remaining 5 BST states?

BST Response:

The implementation date for Single C in the remaining 5 BST states remains unchanged. Single C will be implemented in AL and SC on 7/20/02. NC, KY and TN will be implemented on 8/3/02.

5. BST to redistribute list of 24 switches that require equipment changes as these are the switches the potential exists for service disruption to CLEC end users upon conversion to UNE P for which the CLEC is blamed, not BST.

BST Response:

See answer to #2. Again, these are the switches that require a change in equipment, which may result in a service interruption, when converting from a non-caller id service to a caller id capable UNE-P port.

6. BST to distribute revised user requirements based on answers provided to CLECs

BST Response:

BST will provide an addendum to the user requirements, which will reflect a log of all the questions/responses on CR0756. The addendum will be provided by no later than Friday, June 14, 2002.

7. BST to provide additional explanation as to when and why BST does not follow IntraLATA PIC as on LSR?

a. DA calls via OLNS are routed to BST's intraLATA when CLECs expect them to go to CLEC LPIC on LSR

ATTACHMENT 20

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

Date: May 8, 2002

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR1). (Formerly Observation 140.)

Exception:

BellSouth is not classifying Change Requests as defects in accordance with the BellSouth definition of a Defect.

Background:

The BellSouth Change Control Process defines a defect as the following: "Any non type 1 change that corrects problems discovered in production version of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to CLECs. In addition, if functional requirements agreed on by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match, this will be addressed as a defect."¹

Issue:

During KPMG Consulting's review of BellSouth Change Requests, KPMG Consulting has found the following issues were opened by BellSouth and but not classified as a defect or not opened in any change request.

1. Defect 15369 – The BellSouth Systems do not auto clarify on incorrectly populated LSRS for a multi-line hunting partial disconnect. This has been reclassified as a feature.
2. Defect 15652 – The BellSouth systems do not auto clarify on orders that require changing of TN and listing on the same TN at the same time. This should result in a clarification, as such an order will prevent service order generation. This has been reclassified as a feature
3. Feature 9748 – LENS does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) information on xDSL orders submitted through LENS.

¹ Change Control Process, Version 2.6, 9/10/01, Page 42, available at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/ccp_bccp_guide.pdf

AMENDED EXCEPTION 123

BellSouth OSS Testing Evaluation

4. Help Desk issue – BellSouth identified the following error in TAG “COGAPI error doesn't get generated on COG. This is a default error that is produced from TAG when Orbix tries to communicate to SGG.” No defect or feature was opened to address this issue.
5. Release 10.2 – BellSouth implemented release 10.2 on 11/3/01. BellSouth identified the errors in the release that caused 30% of CLEC orders to inappropriately reject². The errors in release 10.2 are being addressed, but no defect has been opened to address these issues.

KPMG Consulting believes the issues listed above were incorrectly classified as features or were not addressed by any change request. Each of the above issues is the result of defects in either the user requirements or business rules, or result inoperable functionality and therefore should be classified as defects.

Impact:

BellSouth is required to provide workarounds and/or fixes for all Defect Change Requests within a specified timeframe. However, issues classified as features or not opened as any type of change request are not subject to any resolution timeframe. The lack of timely workarounds and resolutions to defects may result in the CLECs inability to efficiently execute transactions with BellSouth resulting in CLEC customer dissatisfaction.

BellSouth Response:

BellSouth is committed to appropriately identifying changes that impact CLECs by communicating them through CCP in accordance with the Change Control Process.

In the case of defects 15369 and 15652, they were rejected as defects since business rules/requirements do not exist to support the activity. Consequently, these items were returned with a request that a system enhancement (i.e., feature) be developed.

In the Change Control Process, an enhancement (i.e., feature) is a function, which has never been introduced into the system; improving or existing functions; required functional changes to system interfaces, data, or business rules; any change in the User Requirements in a production system.

System enhancement 9748 is currently undergoing internal analysis. If it is determined that the CLECs are impacted, this information will be communicated through CCP.

On October 1, 2001, a defect was opened to address the Help Desk issue. This defect is currently in the analysis phase, which should determine if it impacts CLECs. Again, if it

² Carrier notifications SN91082706 and SN91082611 available at http://www.interconnection.bellsouth.com/notifications/carrier/carrier_lett_01.html

AMENDED EXCEPTION 123
BellSouth OSS Testing Evaluation

is determined that the CLECs are impacted, this information will be communicated through CCP.

Regarding the implementation of release 10.2, in Carrier Notification, SN91082611, dated November 2, 2001, BellSouth communicated that "During testing, BellSouth determined that when there are two or more addresses reflected in RSAG, the LSR will be rejected or auto clarified back to the CLEC requesting a valid address."

The letter also acknowledged that effective, 11/17/2001, BellSouth would begin processing LSRs when a working address and a previous, non-working, address...is reflected in RSAG.

This issue was resolved on 11/17/01. Although a formal defect was not opened via CCP, BellSouth did communicate this issue through CCP via a Carrier Notification. BellSouth is committed to adhering to the Change Control Process.

BellSouth Amended Response:

The BellSouth internal features 15369 and 15652 were combined into one feature, which was submitted to CCP on 1/10/02 as expedited feature CR0606 Ordering Enhancements to Address Hunting. This feature is scheduled for implementation on 2/2/02 in Release 10.3.1. The User Requirements were reviewed with the CLECs on Wednesday, 1/23/02.

Enhancement 9748 does not require the CLEC to make coding changes since it is a LENS-based change. Although BellSouth initiated this feature internally, no decision has been made to pursue it. Discussions are still in progress. With the acceptance of the proposed revisions to the CLEC Affecting definition, CR0569, BellSouth has agreed to also submit changes that impact what a CLEC sees/receives if it is different than what is seen today. If it is determined that BellSouth wants to pursue this enhancement, it will be communicated to the CLECs through CCP.

The Help Desk Issue related to the TAG COGAPI error, discovered during CAVE testing, was determined to be a low impact defect. During certain LMU inquiries that CLECs submitted, they received a 'back end resource error limitation' message. When the inquiry was resubmitted, the CLEC received the desired result. This low impact defect was corrected in Release 10.3.1 on 1/5/02.

BellSouth is working on a defect management process to ensure that timeframes are established to support communicating information in a timely manner to CLECs. This includes defects discovered during CAVE testing that are not corrected before testing ends. BellSouth plans to discuss this new process with the CLECs at the February 27th CLEC Monthly Status meeting.

Timeframes established for validating defects are reflected in the following table:

AMENDED EXCEPTION 123

BellSouth OSS Testing Evaluation

CCP Documentation	Encore Documentation
High Impact: 4 hours	1 – Critical: 2 hours
Medium Impact: 1 business day	2 – Serious: 3 work days
Low Impact: 1 business day	3 – Moderate: 3 work days
	4 – Tolerable/Moderate: 3 work days

Timeframes for resolving defects are reflected in the following table:

	High Impact	Medium Impact	Low Impact
Open and validate	4 hours	1 business day	1 business day
Internal validation	1 business day	3 business days	3 business days
Develop workaround	1 business day	2 business days	3 business days
Internal resolution	10 business days (best effort)	90 days (best effort)	Best effort

The Change Control Process document (December 7, 2001 – page 43) indicates the above referenced intervals for Validation and Resolution Of a Type 6 Change – CLEC-impacting defect (excluding documentation).

BellSouth Second Amended Response:

BellSouth is re-educating its internal groups on the proper application of CCP guidelines with regard to the new definition of “CLEC-affecting” and the Type 6 Defect process. In addition, BellSouth is developing an internal document to address the procedures for negotiating “defect hand-offs” to internal groups. The target date for completing this document is mid to late April. BellSouth will notify KPMG of the specific date the document will be available. The new process will ensure that CLEC feature enhancements and defects are properly classified and communicated through the Change Control Process.

BellSouth Third Amended Response:

BellSouth submits the revised proprietary document entitled Type 6: Defect Notification Internal Process, initially submitted to KPMG on April 26, 2002.

Amended Issue:

During the Second Flow Through Retest, KPMG Consulting identified 66 PONs that did not properly flow through BellSouth’s systems. As a result, KPMG Consulting issued Third Amended Exception 86³ on April 8, 2002. BellSouth’s response to Exception 86⁴ indicates that BellSouth has identified system enhancements that will be necessary to correct the Flow through issues identified in Exception 86. During a review of the

³ <http://www.psc.state.fl.us/industry/telecomm/oss/exceptions.cfm>

⁴ Ibid.

AMENDED EXCEPTION 123

BellSouth OSS Testing Evaluation

BellSouth Change Control Process, KPMG Consulting found that BellSouth failed to follow the defect process, as outlined in the Change Control Process, version 2.8⁵, with regard to issues identified in Exception 86. Specifically:

- BellSouth failed to correctly classify the issues identified in Exception 86 as defects. The issues identified in Exception 86 indicate that the BellSouth systems are not operating in accordance with the BellSouth Business Rules for Local Ordering. As a result, these issues should have been classified as defects, not as enhancements.
- BellSouth failed to open Type 6 Change Requests associated with the defects. Further, BellSouth failed to adhere to the intervals for validating and opening defects.

Impact:

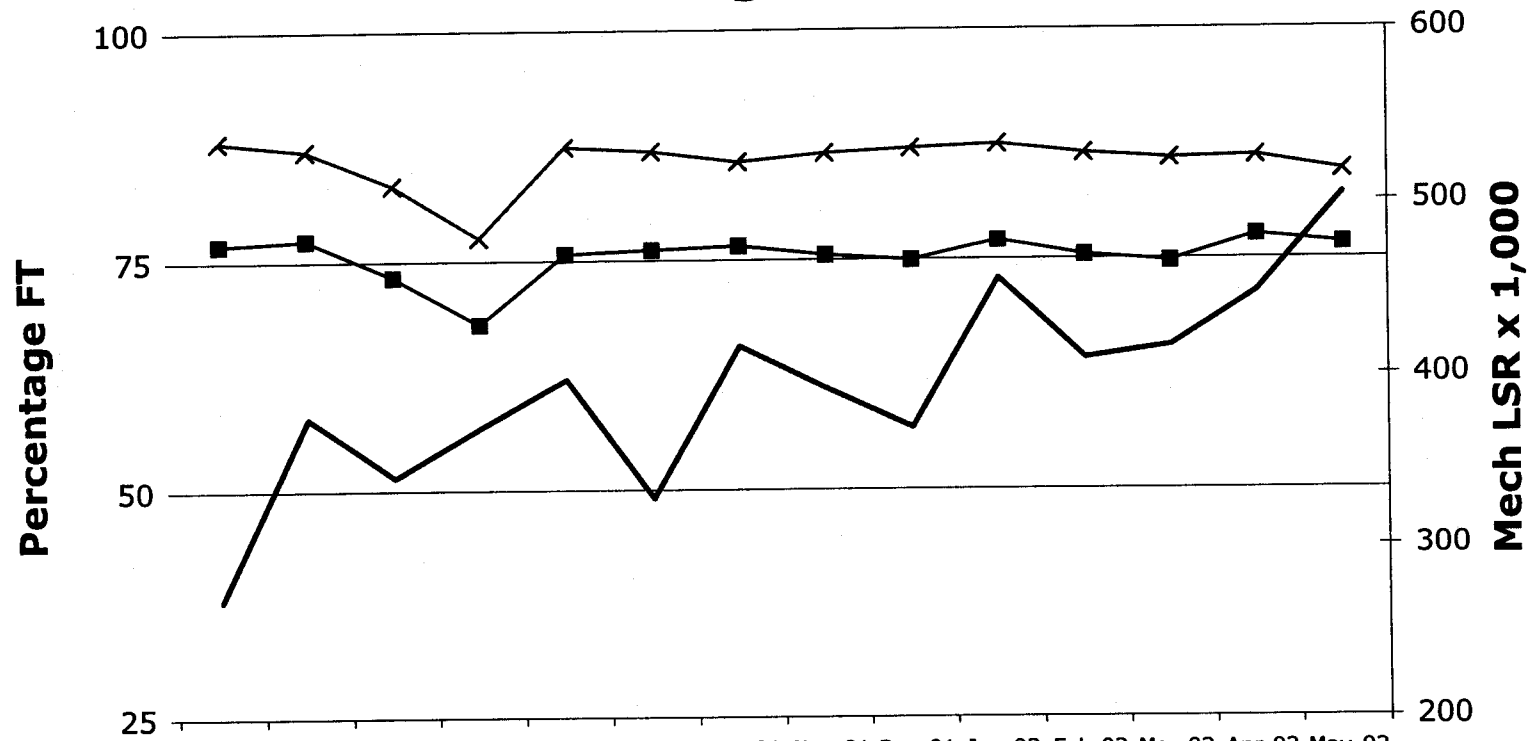
BellSouth is required to provide workarounds and/or fixes for all Defect Change Requests within a specified timeframe. However, issues classified as features or not opened as any type of change request are not subject to any resolution timeframe. The lack of timely workarounds and resolutions to defects may result in the CLECs inability to efficiently execute transactions with BellSouth resulting in CLEC customer dissatisfaction.

⁵ Now available in Change Control Process, version 2.9, Section 5.0 available at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/ccp_bccp_guide.pdf

ATTACHMENT 21

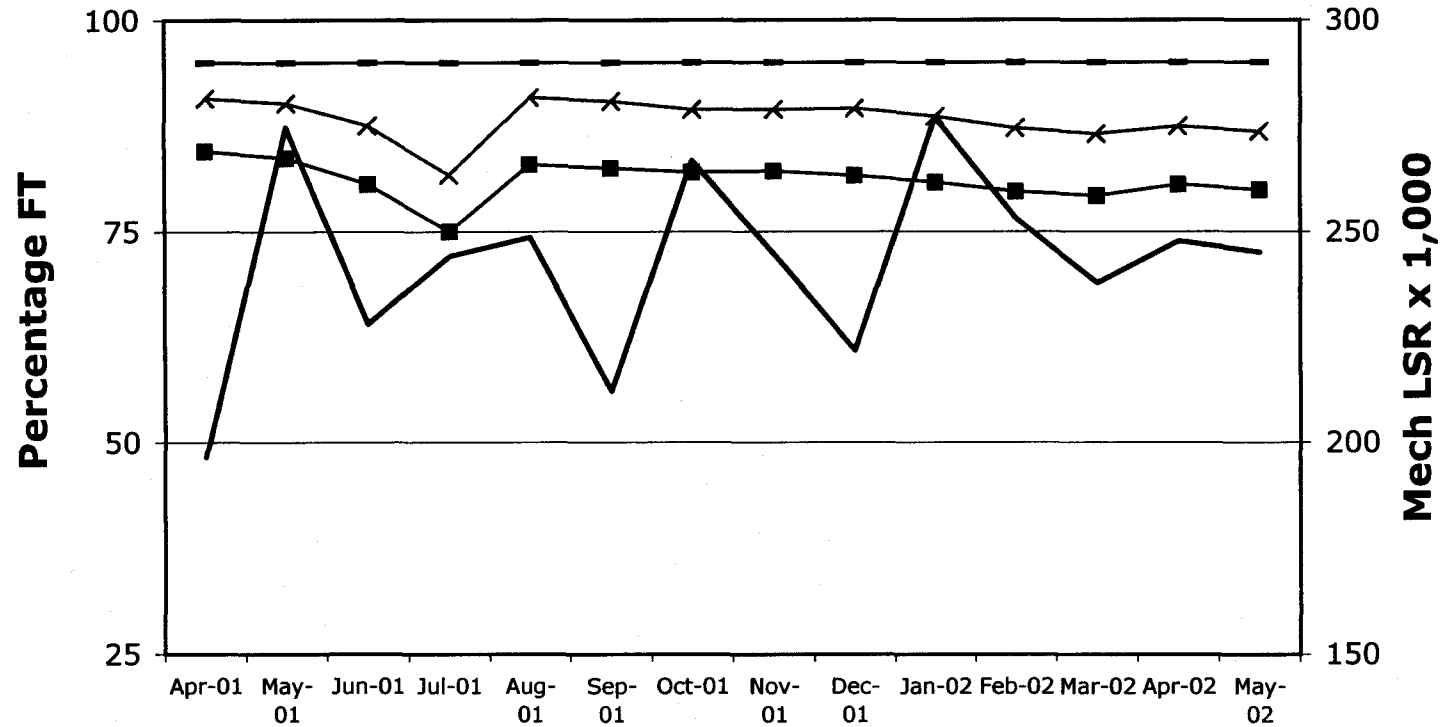
JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

Flow Through - Aggregate



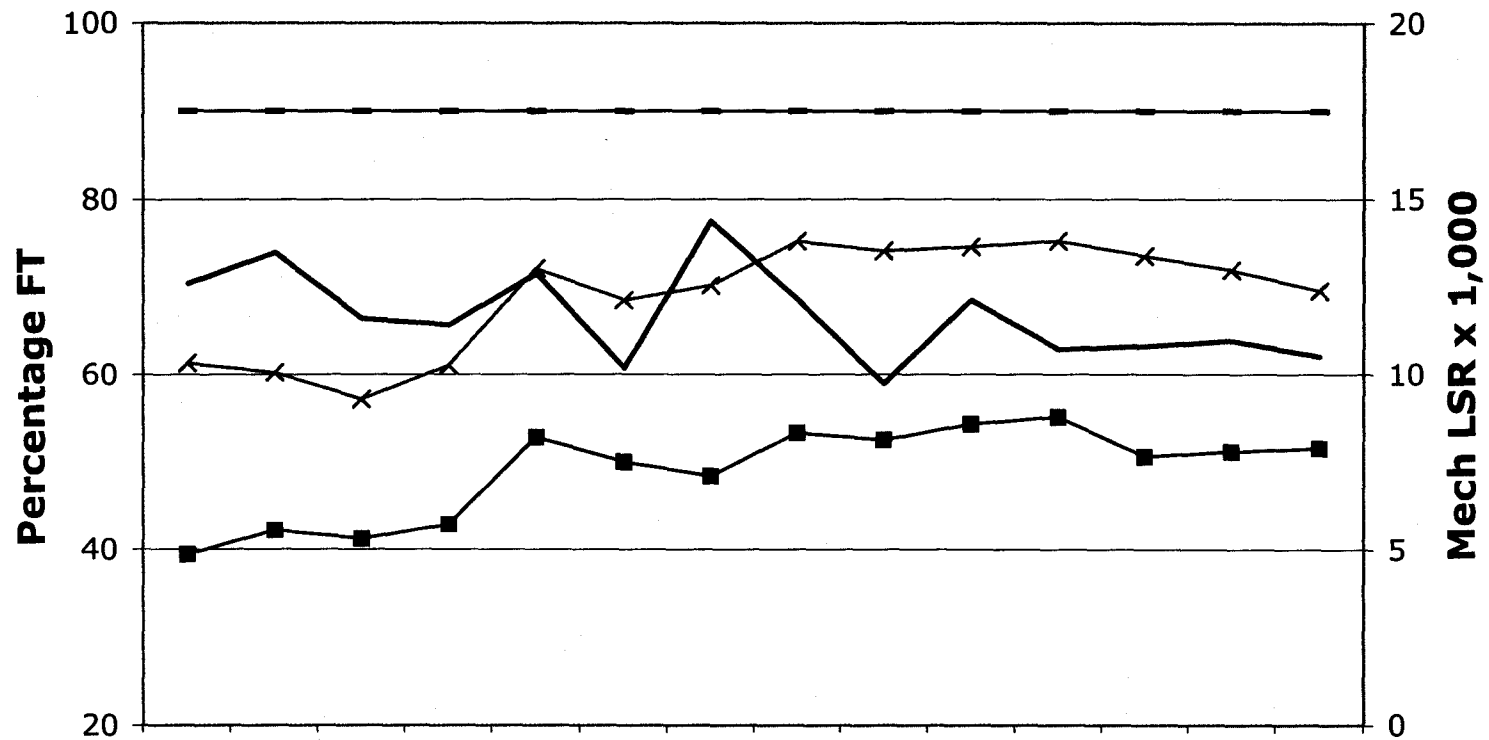
	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
—x— %Flow Through	88.0	87.0	83.2	77.5	87.3	86.8	85.6	86.5	87.0	87.4	86.4	85.8	86.1	84.5
—■— %Achieved Flow Through	76.8	77.3	73.3	68.1	75.7	76.1	76.5	75.5	74.9	77.0	75.4	74.7	77.5	76.6
— Total Mech LSR's x 1,000	268.9	375.6	340.8	369.8	397.6	328.4	416.6	392.0	369.0	455.5	409.3	416.3	447.6	503.6

Flow Through - Residential



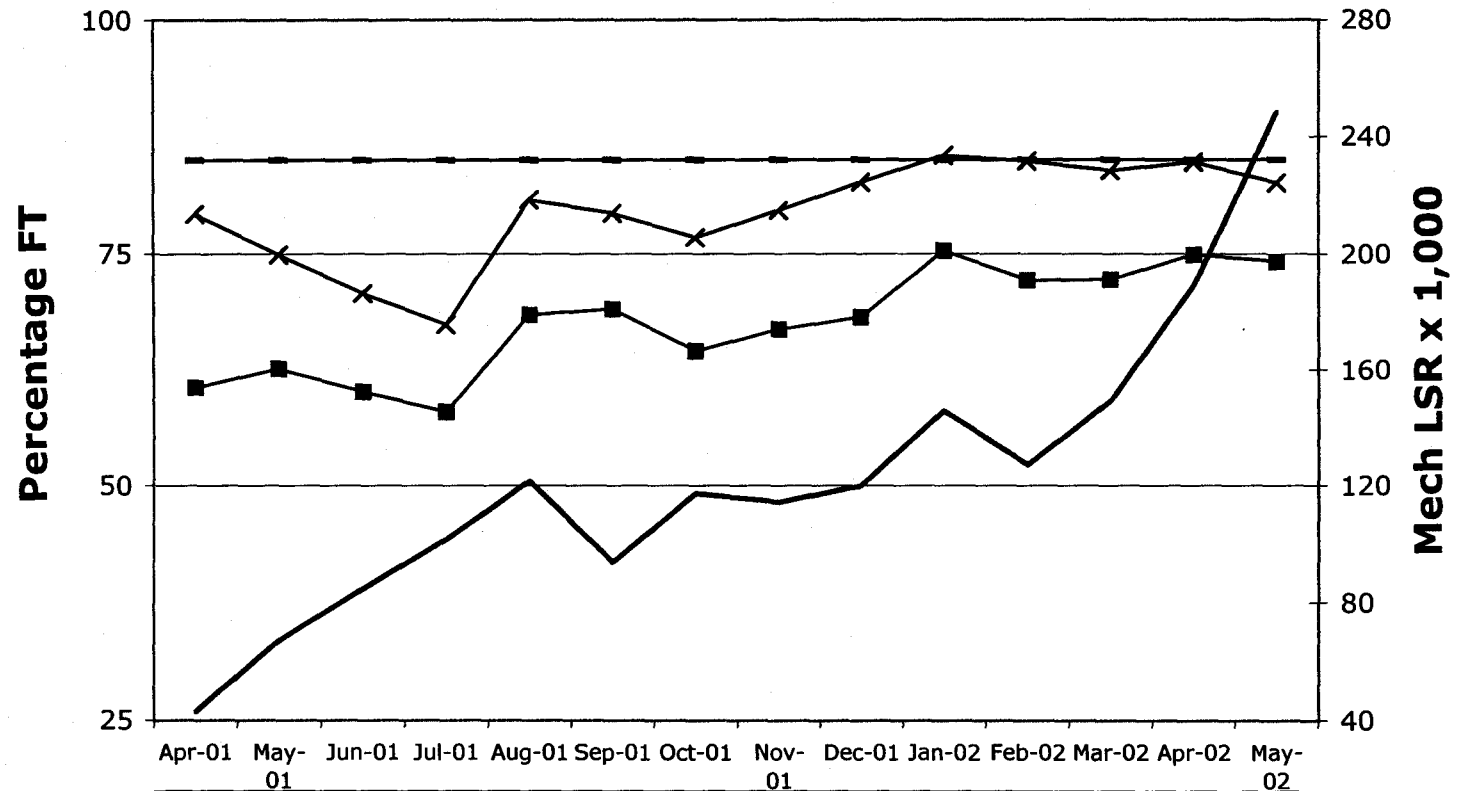
	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
— %Benchmark	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0
—x %Flow Through	90.7	90.2	87.5	81.7	90.8	90.4	89.4	89.4	89.5	88.6	87.2	86.5	87.4	86.7
—■ % Achieved Flow Through	84.5	83.7	80.6	75.0	82.9	82.5	82.0	82.1	81.6	80.8	79.7	79.2	80.5	79.9
— Total Mech LSR's x 1,000	196.5	274.6	228.0	244.1	248.6	212.1	266.8	244.5	221.7	276.9	253.1	237.7	247.7	245

Flow Through - Business



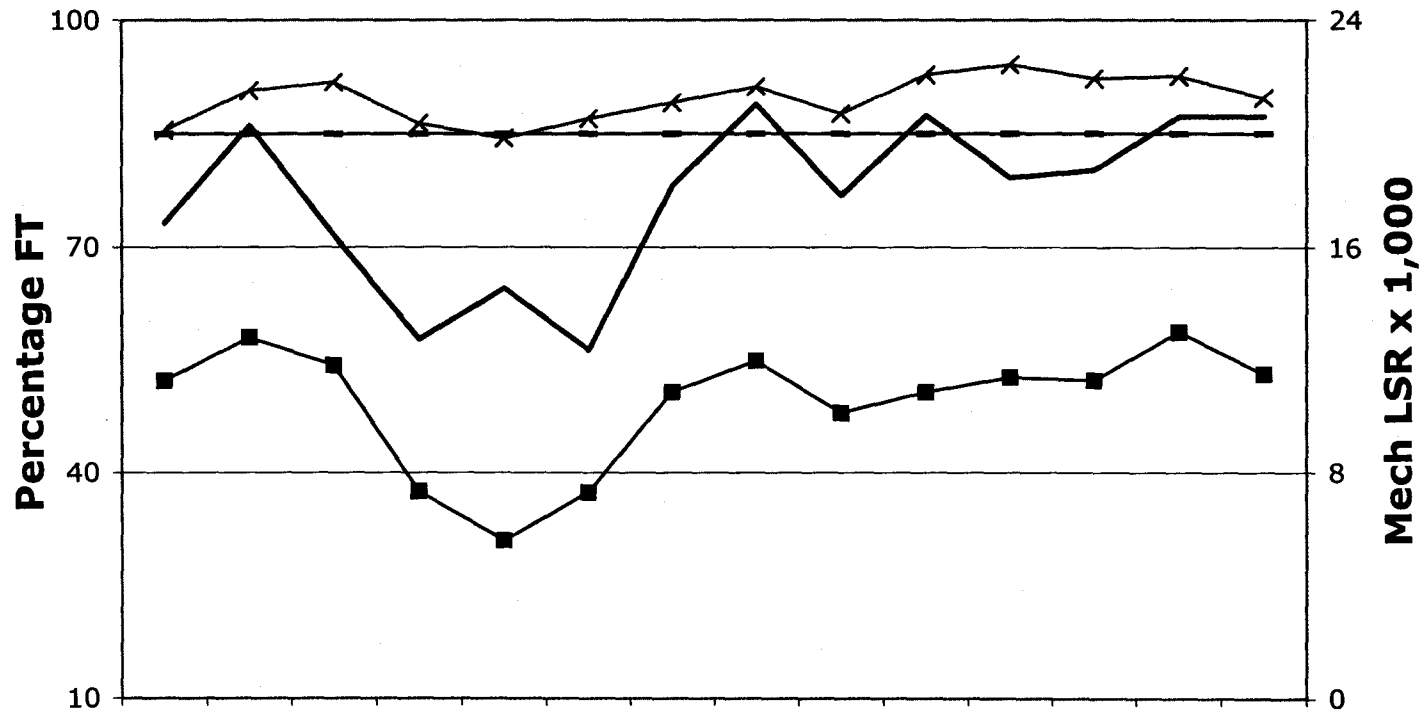
	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
— %Benchmark	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0
—x— %Flow Through	61.3	60.1	57.1	61.0	72.1	68.5	70.2	75.2	74.1	74.6	75.2	73.5	71.9	69.5
—■— % Achieved Flow Through	39.4	42.2	41.2	42.9	52.8	50.0	48.4	53.3	52.5	54.3	55.1	50.6	51.2	51.6
— Total Mech LSR's x 1,000	12.6	13.5	11.6	11.4	12.9	10.2	14.4	12.1	9.7	12.1	10.7	10.8	10.9	10.5

Flow Through - UNE



	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
— %Benchmark	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0
—x— %Flow Through	79.3	74.9	70.7	67.3	80.82	79.3	76.7	79.7	82.7	85.5	84.9	83.9	84.8	82.6
—■— % Achieved Flow Through	60.6	62.6	60.1	57.9	68.4	69.0	64.5	66.8	68.1	75.3	72.1	72.2	74.9	74.1
— Total Mech LSR's x 1,000	42.9	67.2	84.7	101.6	121.6	93.7	117.3	114.3	119.8	145.8	127.0	149.1	189.0	248.1

Flow Through - LNP



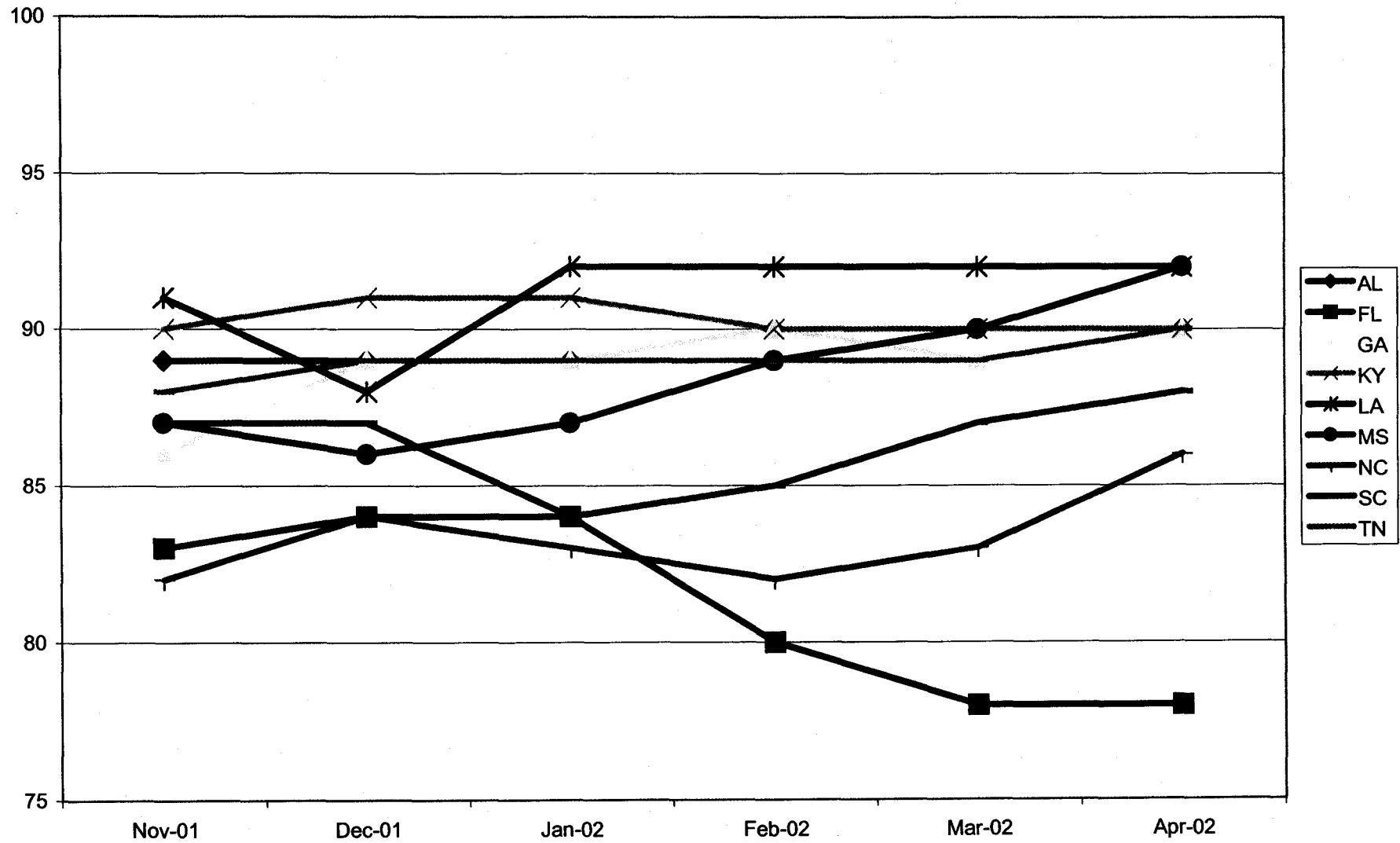
	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
— %Benchmark	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0
—x— %Flow Through	85.5	90.7	91.8	86.4	84.4	87.0	89.1	91.2	87.6	92.8	94.1	92.3	92.6	89.8
—■— % Achieved Flow Through	52.2	58.0	54.3	37.5	30.9	37.3	50.7	54.9	47.9	50.7	52.7	52.3	58.8	53.2
— Total Mech LSR's	16.8	20.3	16.4	12.7	14.6	12.4	18.2	21.0	17.8	20.6	18.4	18.7	20.6	20.6

	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Aggregate														
Total Mech LSR's x 1,000	268.9	375.6	340.8	369.8	397.6	328.4	416.6	392.0	369.0	455.5	409.3	416.3	447.6	503.6
% Achieved Flow Through	76.8	77.3	73.3	68.1	75.7	76.1	76.5	75.5	74.9	77.0	75.4	74.7	77.5	76.6
%Flow Through	88.0	87.0	83.2	77.5	87.3	86.8	85.6	86.5	87.0	87.4	86.4	85.8	86.1	84.5
Residential	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Total Mech LSR's	196,503.0	274,630.0	228,019.0	244,057.0	248,610.0	212,130.0	266,809.0	244,533.0	221,718.0	276,926.0	253,123.0	237,652.0	247,694.0	245,039.0
Total Mech LSR's x 1,000	196.5	274.6	228.0	244.1	248.6	212.1	266.8	244.5	221.7	276.9	253.1	237.7	247.7	245
% Achieved Flow Through	84.5	83.7	80.6	75.0	82.9	82.5	82.0	82.1	81.6	80.8	79.7	79.2	80.5	79.9
%Flow Through	90.7	90.2	87.5	81.7	90.8	90.4	89.4	89.4	89.5	88.6	87.2	86.5	87.4	86.7
%Benchmark	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0	95.0
Business	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Total Mech LSR's	12594.0	13481.0	11590.0	11411.0	12879.0	10172.0	14367.0	12134.0	9724.0	12122.0	10709.0	10,800.0	10,948.0	10,474.0
Total Mech LSR's x 1,000	12.6	13.5	11.6	11.4	12.9	10.2	14.4	12.1	9.7	12.1	10.7	10.8	10.9	10.5
% Achieved Flow Through	39.4	42.2	41.2	42.9	52.8	50.0	48.4	53.3	52.5	54.3	55.1	50.6	51.2	51.6
%Flow Through	61.3	60.1	57.1	61.0	72.1	68.5	70.2	75.2	74.1	74.6	75.2	73.5	71.9	69.5
%Benchmark	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0	90.0
LNP	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Total Mech LSR's	16844.0	20285.0	16411.0	12731.0	14557.0	12350.0	18169.0	21034.0	17807.0	20639.0	18446.0	18,705.0	20,563.0	20604.0
Total Mech LSR's x 1,000	16.8	20.3	16.4	12.7	14.6	12.4	18.2	21.0	17.8	20.6	18.4	18.7	20.6	20.6
% Achieved Flow Through	52.2	58.0	54.3	37.5	30.9	37.3	50.7	54.9	47.9	50.7	52.7	52.3	58.8	53.2
%Flow Through	85.5	90.7	91.8	86.4	84.4	87.0	89.1	91.2	87.6	92.8	94.1	92.3	92.6	89.8
%Benchmark	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0
UNE	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02
Total Mech LSR's	42919.0	67181.0	84738.0	101599.0	121594.0	93716.0	117270.0	114297.0	119789.0	145792.0	127006.0	149,121.0	189,007.0	248,097.0
Total Mech LSR's x 1,000	42.9	67.2	84.7	101.6	121.6	93.7	117.3	114.3	119.8	145.8	127.0	149.1	189.0	248.1
% Achieved Flow Through	60.6	62.6	60.1	57.9	68.4	69.0	64.5	66.8	68.1	75.3	72.1	72.2	74.9	74.1
%Flow Through	79.3	74.9	70.7	67.3	80.82	79.3	76.7	79.7	82.7	85.5	84.9	83.9	84.8	82.6
%Benchmark	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0	85.0
UNE-P									Dec-01	Jan-02	Feb-02	Mar-02		
Total Mech LSR									111,919	135,025	114,977	133,177		
% Achieved Flow Through									68.6	76.6	73.5	74.2		
%Flow Through									83.2	86.4	85.8	85.1		
UNE Loops									Dec-01	Jan-02	Feb-02	Mar-02		
Total Mech LSR									7,865	10,764	12,024	15,711		
% Achieved Flow Through									60.3	57.8	57.9	53.8		
%Flow Through									74.1	72.2	73.8	71.7		

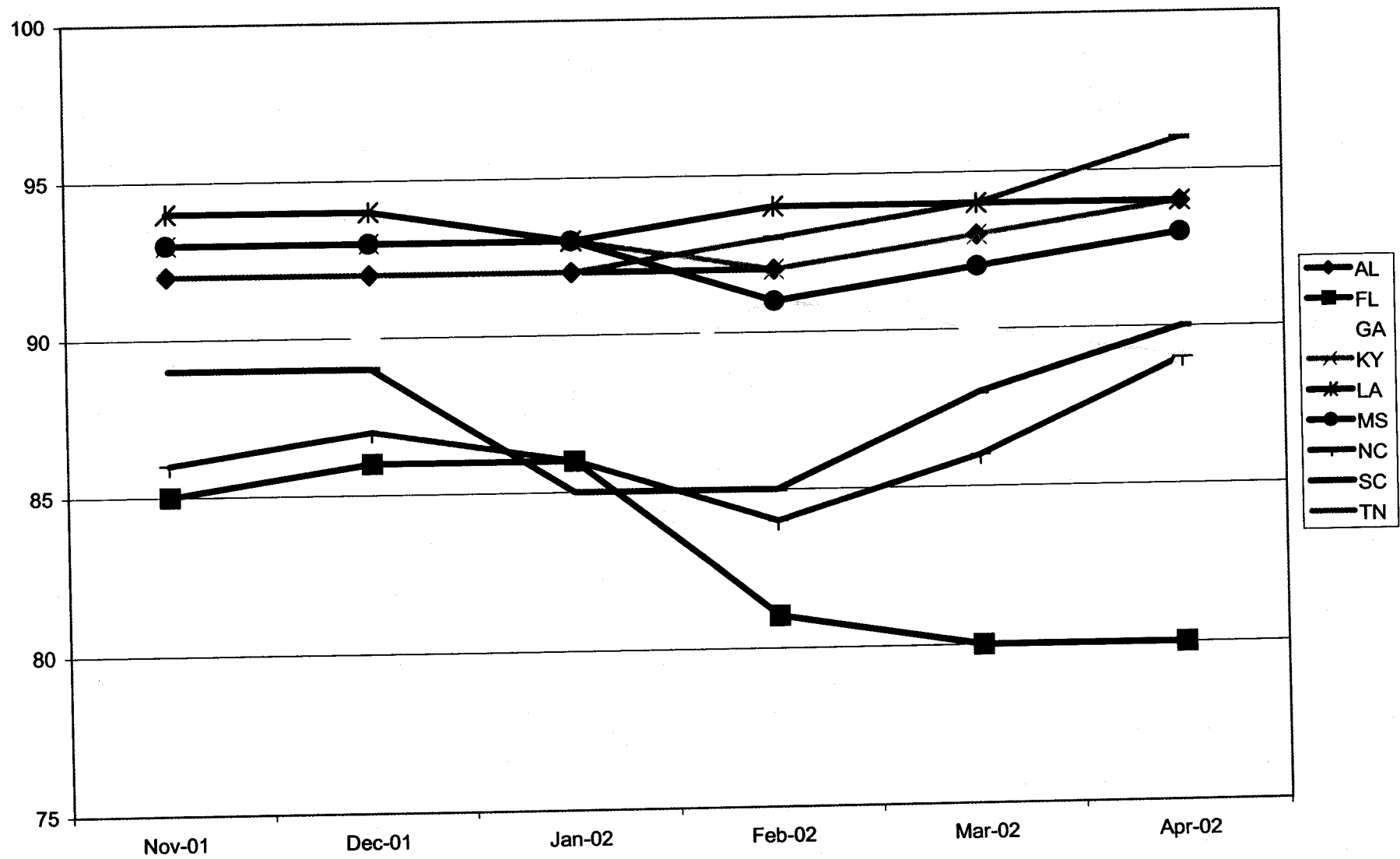
ATTACHMENT 22

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

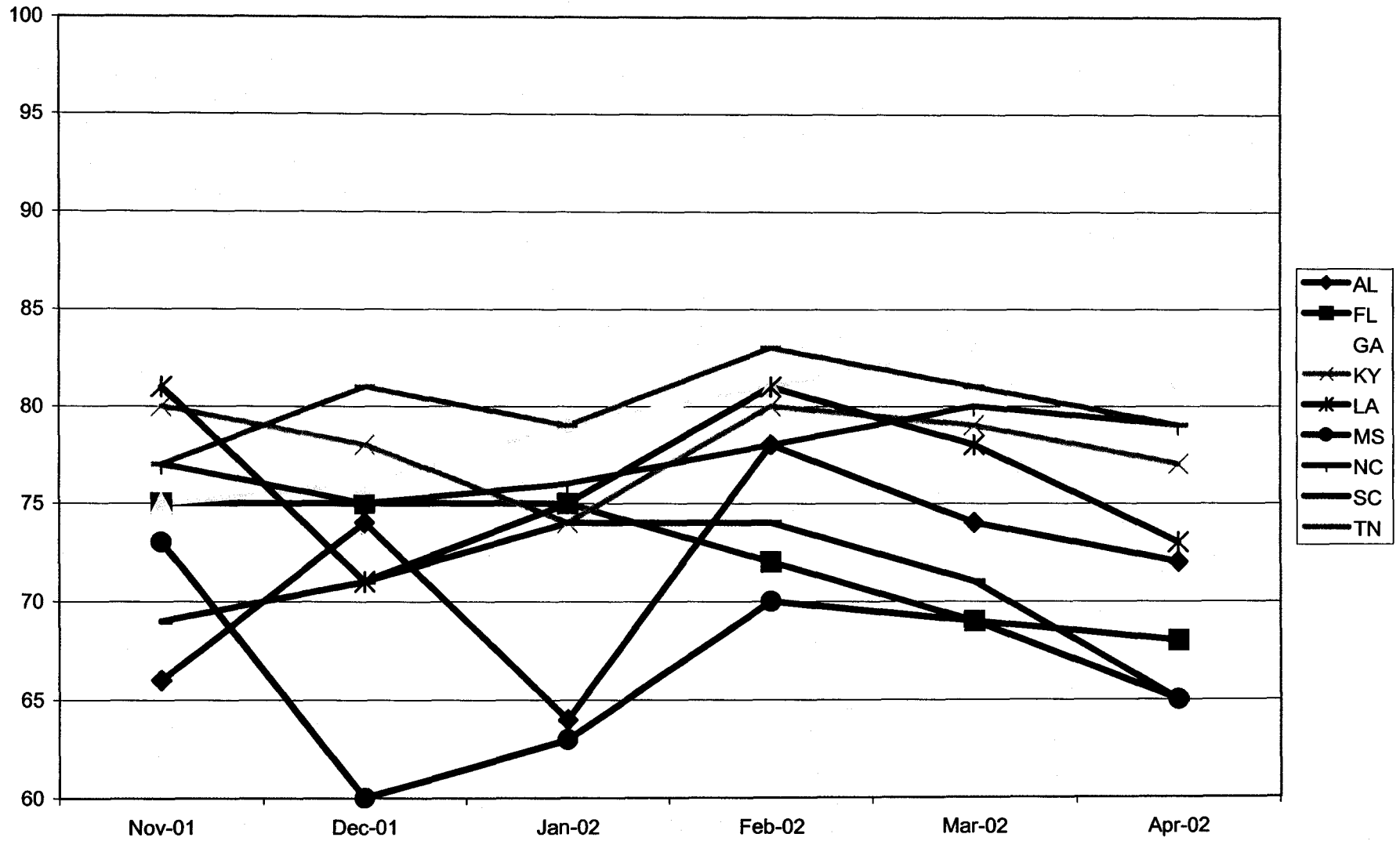
Aggregate % Flow Through - State Specific



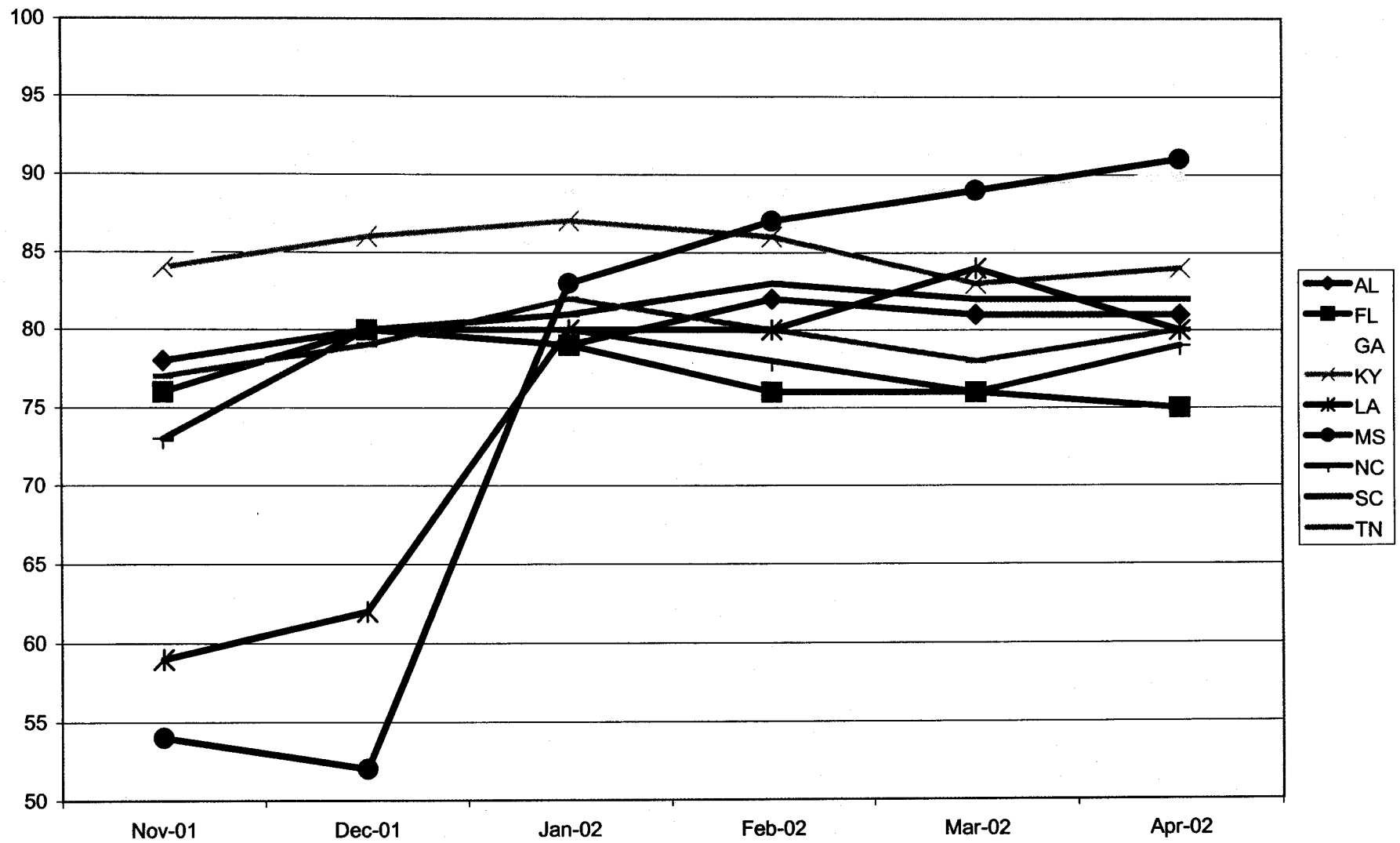
Residence % Flow Through - State Specific



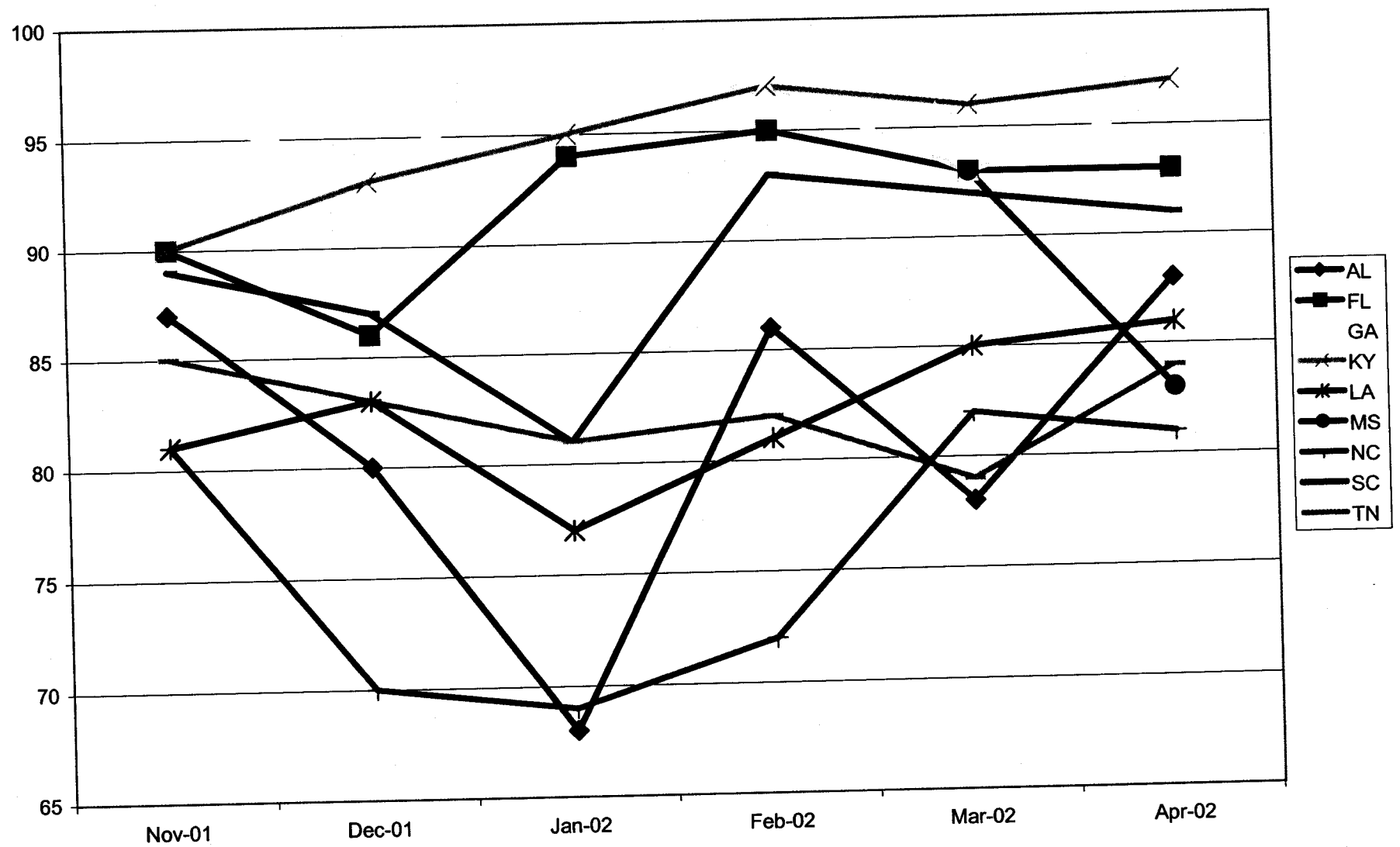
Business % Flow Through - State Specific



UNE % Flow Through - State Specific



LNP % Flow Through - State Specific



State Specific Flow Through Data
Source - Discovery Responses in TRA Docket NO. 01-00362 and Docket NO. 97-00309

Aggregate % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	89	89	89	90	90	90
FL	83	84	84	80	78	78
GA	86	89	89	90	89	90
KY	90	91	91	90	90	90
LA	91	88	92	92	92	92
MS	87	86	87	89	90	92
NC	82	84	83	82	83	86
SC	87	87	84	85	87	88
TN	88	89	89	89	89	90

Residence % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	92	92	92	92	93	94
FL	85	86	86	81	80	80
GA	91	90	88	91	90	89
KY	93	93	93	92	93	94
LA	94	94	93	94	94	94
MS	93	93	93	91	92	93
NC	86	87	86	84	86	89
SC	89	89	85	85	88	90
TN	92	92	92	93	94	96

Business % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	66	74	64	78	74	72
FL	75	75	75	72	69	68
GA	75	76	79	81	83	81
KY	80	78	74	80	79	77
LA	81	71	75	81	78	73
MS	73	60	63	70	69	65
NC	77	75	76	78	80	79
SC	69	71	74	74	71	65
TN	77	81	79	83	81	79

UNE % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	78	80	79	82	81	81
FL	76	80	79	76	76	75
GA	84	89	89	89	89	90
KY	84	86	87	86	83	84
LA	59	62	80	80	84	80
MS	54	52	83	87	89	91
NC	73	80	80	78	76	79
SC	73	80	81	83	82	82
TN	77	79	82	80	78	80

LNP % Flow Through

	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02
AL	87	80	68	86	78	88

State Specific Flow Through Data

Source - Discovery Responses in TRA Docket NO. 01-00362 and Docket NO. 97-00309

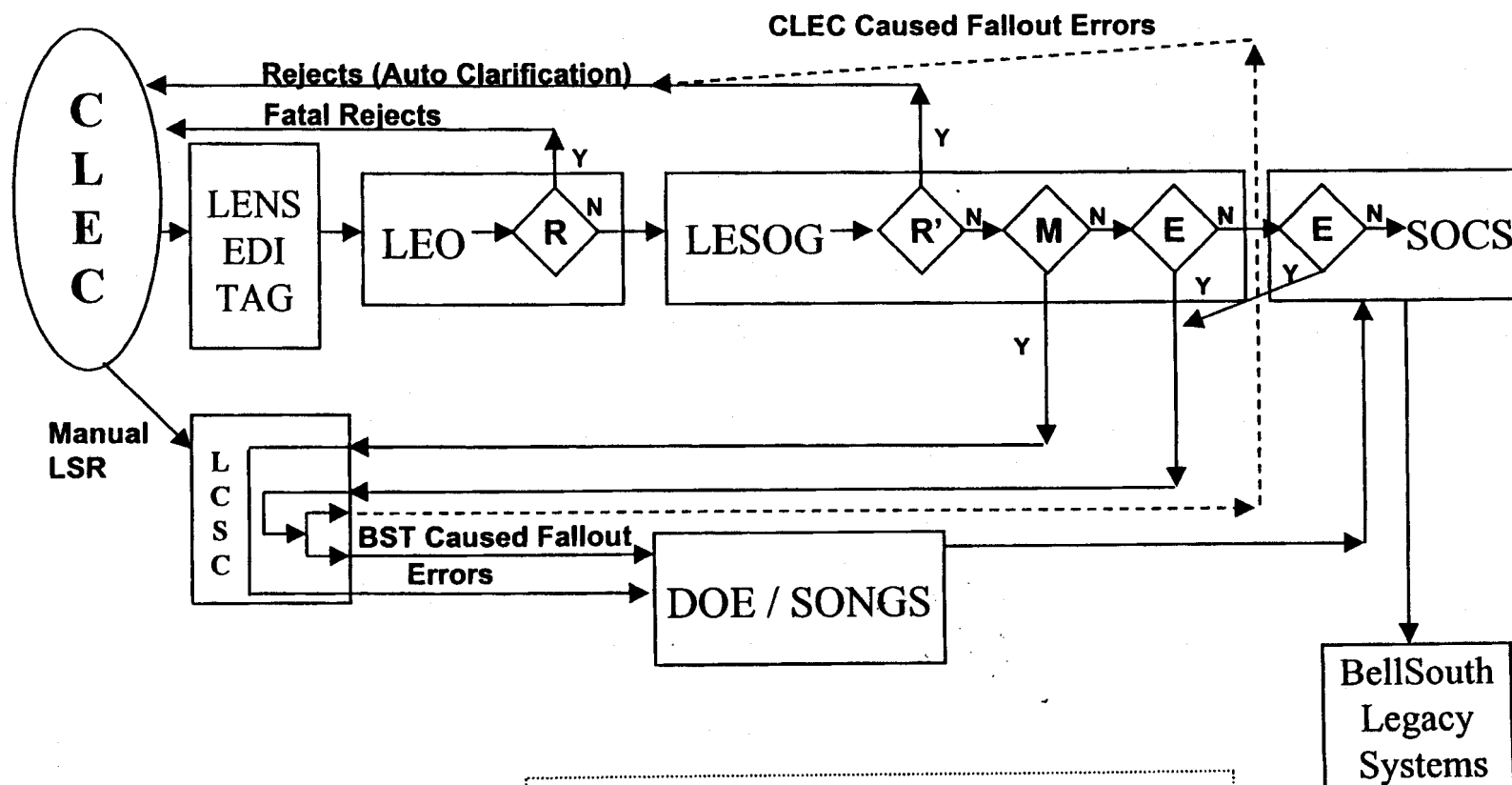
FL	90	86	94	95	93	93
GA	96	94	97	97	93	96
KY	90	93	95	97	96	97
LA	81	83	77	81	85	86
MS					93	83
NC	81	70	69	72	82	81
SC	89	87	81	93	92	91
TN	85	83	81	82	79	84

ATTACHMENT 23

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

Stacy Affidavit – Exhibit OSS-62

CLEC Ordering Process Flow



R - Fatal Reject - Returned to CLEC
 R' - Auto Clarification - Returned to CLEC
 M - Manual - Fall out to LCSC for manual processing
 E - Error - Clarification by LCSC (either CLEC error or BST error)

Flow-Through

$$\begin{array}{l} \text{CLEC Error Excluded} \\ \text{Calculation} \end{array} = \frac{\text{Issued Svc Orders}}{\text{Total Mech LSRs - (Manual FO + Auto Clar + Pending Supps + CLEC Errors)}}$$

$$\begin{array}{l} \text{Base} \\ \text{Calculation} \end{array} = \frac{\text{Issued Svc Orders}}{\text{Total Mech LSRs - (Manual FO + Auto Clar + Pending Supps)}}$$

$$\begin{array}{l} \text{Achieved} \\ \text{Flowthrough} \end{array} = \frac{\text{Issued Svc Orders}}{\text{Total Mech LSRs - (Auto Clar + Pending Supps + CLEC Errors)}}$$

Exhibit OSS-62

ATTACHMENT 24

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

Sources of Manual Fallout Load on the LCSC

2002	% BellSouth Designed Fallout and System Error	% CLEC Caused Fallout
January	19.37%	4.05%
February	20.37%	4.55%
March	21.00%	4.65%
April	19.65%	4.08%
May	19.97%	4.64%

ATTACHMENT 25

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

CLEC Actions Cannot Impact Reported Percent Flow Through Results

The Design of the Percent Flow Through Measure in BellSouth States eliminates any impact to the reported result from changes in the level of either CLEC input errors or "designed manual fallout". Thus the reported results are in no way dependent upon "the ability of the competing carriers" or their business plans.

Background

When an electronic LSR is submitted to BellSouth there are six possible outcomes. Only one outcome (**Issued SO's**) represents success. Five of the six are used in the calculation of Percent Flow Through.

The calculation of the Percent Flow Through measure is described in the SQM as follows: (Flow Through Report Column corresponding to definition.)

$$\text{Percent Flow Through} = a / [b - (c + d + e + f)] \times 100$$

- a = The total number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued. (**Issued SO's**)
- b = The number of LSRs passed from LEO.LNP Gateway to LESOG/LAUTO. (**Total Mech LSRs**)
- c = The number of LSRs that fallout for manual processing. (**Total Manual Fallout**)
- d = The number of LSRs that are returned to the CLEC for clarification. (**Auto Clarification**)
- e = The number of LSRs that contain errors made by CLECs. (**CLEC Caused Fallout**)
- f = The number of LSRs that receive a Z status. (**Pending Supps (Z Status)**)

The value for the sixth possible outcome when an electronic LSR is submitted (**BST Caused Fallout**) is not used in the calculation. It is the impact of this single value that Percent Flow Through is actually measuring.

Baseline Case Study

To illustrate how this measurement eliminates the impact of CLEC errors (**Auto Clarification and CLEC Caused Fallout**) and designed manual fallout (**Total Manual Fallout**) we will examine the calculation associated with company name 204 in the March 2002 Flow Through Report. The values from the report are:

Outcome	Value
(Issued SO's)	5,003
(Total Mech LSRs)	20,502
(Total Manual Fallout)	1,185
(Auto Clarification)	5,902
(CLEC Caused Fallout)	4,339
(Pending Supps (Z Status))	8
(BST Casued Fallout)	4,065

The calculation is as follows:

$$\text{Percent Flow Through} = 5,003 / [20,502 - (1,185 + 5,902 + 4,339 + 8)] \times 100$$

$$\text{Percent Flow Through} = 5,003 / [20,502 - (11,434)] \times 100$$

$$\text{Percent Flow Through} = 5,003 / 9,068 \times 100$$

$$\text{Percent Flow Through} = 55.17\%$$

Reduction in CLEC Input Errors

If we assume that the CLEC had made 3,000 less auto clarification errors (approximately a 50% reduction), we can adjust the values and calculate a "revised" percent flow through. Since errors result in resubmission of LSRs, if the CLEC had made 3,000 fewer errors, there would also have been 3,000 fewer LSRs submitted. The values for this revision are: **(Changes bolded.)**

Outcome	Value
(Issued SO's)	5,003
(Total Mech LSRs)	17,502
(Total Manual Fallout)	1,185
(Auto Clarification)	2,902
(CLEC Caused Fallout)	4,339
(Pending Supps (Z Status))	8
(BST Casued Fallout)	4,065

$$\text{Percent Flow Through} = 5,003 / [17,502 - (1,185 + 2,902 + 4,339 + 8)] \times 100$$

$$\text{Percent Flow Through} = 5,003 / [17,502 - (8,434)] \times 100$$

$$\text{Percent Flow Through} = 5,003 / 9,068 \times 100$$

$$\text{Percent Flow Through} = 55.17\%$$

ATTACHMENT 26

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

Summary of Flow Through Task Force Item Status Since Initiation of the Task Force in February 2001

Status	Number	Comments
Implemented	9	2 in 2001, 7 in 2002
Scheduled	9	Including 3 deferred to the LSOG-6 Release in December 2003
Not Scheduled	17	Including 16 of 18 Items prioritized on April 9, 2002
Cancelled	1	
Total	36	

Individual Flow Through Task Force Item Status Since Initiation of the Task Force in February 2001

FTTF #	CCP CR #	Status
FTTF-01	CR-0557	Implemented in R10.3.1 and R10.5
FTTF-02	CR-0241 CR-0003	Targeted for LSOG6 release in December 2003
FTTF-03	CR-0335	Priority Rank 7 - Not Scheduled
FTTF-04	CR-0724	Implemented in R10.5
FTTF-05	CR-0725	Priority Rank 2 - Scheduled for R10.6 (August)
FTTF-06	CR-0726	Priority Rank 9 - Not Scheduled
FTTF-07	CR-0727	Targeted for LSOG6 release in December 2003
FTTF-08	CR-0728	Priority Rank 4 - Not Scheduled
FTTF-09	CR-0731	Cancelled, combined with CR-0688 and Targeted for LSOG6 release in December 2003
FTTF-10	CR-0563	Priority Rank 5 - Not Scheduled
FTTF-11	CR-0541	Priority Rank 6 - Scheduled for R10.6 and R11.0
FTTF-12		Being analyzed - Priority Rank 3 - Not Scheduled
FTTF-13	CR-0029	Scheduled for R10.6 (August 2002)
FTTF-14	CR-0441	Implemented in R10.3
FTTF-15	CR-0078	Implemented in R10.5
FTTF-16	CR-0729	Priority Rank 15 - Not Scheduled
FTTF-17	CR-0137	Implemented in R10.5
FTTF-18	CR-0160	Scheduled for R10.6 (August 2002)
FTTF-19	CR-0088 CR-0357	Priority Rank 16 - Not Scheduled
FTTF-20	CR-0273	Priority Rank 13 - Not Scheduled
FTTF-21	CR-0505	Pending - Not Scheduled
FTTF-22	CR-0506	Priority Rank 18 - Not Scheduled
FTTF-23	CR-0518	Priority Rank 8 - Not Scheduled
FTTF-24	CR-0494	Implemented in R10.5
FTTF-25	CR-0492	Scheduled for R11.0 (December 2002)
FTTF-26	CR-0365	Implemented in R10.5
FTTF-27	CR-0493	Cancelled
FTTF-28	CR-0496	Priority Rank 11 - Not Scheduled
FTTF-29	CR-0490	Implemented in R10.2
FTTF-30	CR-0491	Implemented in R9.2.1
FTTF-31	CR-0495	Priority Rank 9 - Not Scheduled
FTTF-32	CR-0228	Scheduled for R11.0 (December 2002)
FTTF-33	CR-0622	Priority Rank 12 - Not Scheduled
FTTF-34	CR-0625	Priority Rank 1 - Not Scheduled
FTTF-35	CR-0674	Priority Rank 17 - Not Scheduled
FTTF-36	CR-0621	Priority Rank 14 - Determined to be a Defect - Not Scheduled

ATTACHMENT 27

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

EXCEPTION 165

BellSouth Florida OSS Testing Evaluation

Date: May 16, 2002

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation. (TVV1)

Exception:

BellSouth provides inconsistent and incorrect information on Clarification (CLR) responses for Resale, UNE-P, and UNE Loop service requests.

Background:

In response to a Competitive Local Exchange Carrier's (CLEC's) incomplete or incorrect Local Service Request (LSR), BellSouth systems and/or representatives generate a CLR that summarizes the details of the error(s) made on the LSR.

Issue:

KPMG Consulting expects that at least 95% of all clarification responses from BellSouth be accurate and complete¹. A sample of CLR responses was reviewed to determine the accuracy and completeness of the content of the response. Of the total responses reviewed, 17% (54/308) were determined to be inaccurate.

The PONs listed in Attachment I received CLR responses from BellSouth that did not accurately and/or clearly identify the actual error, if any, and in some cases there was no error on the LSR.

Impact:

BellSouth's failure to accurately review the service requests for errors and clarifications may require CLECs to utilize additional resources to verify order information before successfully processing individual customer orders. Inaccurately clarified service requests may result in Missed Appointments and rescheduled orders, decreasing CLEC customer satisfaction.

¹ In the absence of a Florida Public Service Commission approved standard for this measure KPMG Consulting uses its professional judgment.

EXCEPTION 165 ATTACHMENT I

CC	PON * VER	LSR SENT D/T	CLR RECEIVED D/T	CLR MESSAGE
9993	018042HPTN100003*02	4/23/02 4:50 PM	4/24/02 11:56 AM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100003*01	4/23/02 11:12 AM	4/23/02 4:11 PM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100004*00	4/23/02 11:19 AM	4/23/02 4:13 PM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100005*01	4/23/02 11:32 AM	4/23/02 4:15 PM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100006*00	4/23/02 11:30 AM	4/23/02 4:17 PM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100007*00	4/23/02 11:40 AM	4/23/02 4:19 PM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100008*02	4/23/02 12:12 PM	4/23/02 4:23 PM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100009*00	4/23/02 11:52 AM	4/23/02 4:20 PM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100010*00	4/23/02 12:10 PM	4/23/02 4:21 PM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100011*01	4/23/02 12:24 PM	4/23/02 4:25 PM	EATN AND REMARKS NEED TO BE POPULATED
9993	018042HPTN100012*02	4/23/02 12:47 PM	4/23/02 4:26 PM	EATN AND REMARKS NEED TO BE POPULATED
9990	035051HPMC000006*00	4/4/02 12:45 PM	4/8/02 11:56 AM	LOCNUM REQUIRED ON PS PAGE
9993	018031HPEN000051*02	3/21/02 11:46 AM	3/22/02 11:56 AM	HTSEQ AND HLA REQUIRED WHEN REMOVING LINES FROM A HUNT GROUP
9993	018031HPEN001051*00	4/1/02 2:56 PM	4/2/02 3:05 PM	HTSEQ AND HLA REQUIRED WHEN REMOVING LINES FROM A HUNT GROUP
9990	028911HPEN000002*00	4/19/02 3:32 PM	4/22/02 4:51 PM	INIT FAX NO REQUIRED. ATN, LTN, BAN1, DDD, AND D/T SENT FIELDS FORMATTED INCORRECTLY. CHECK EU NAME
9993	002191HPTN100006*01	3/20/02 4:00 PM	3/21/02 10:27 AM	YPH AND SIC ARE REQUIRED FOR RESIDENCE TO BUSINESS SWITCH ALSO MUST PORVIDE LISTING CHANGE
9993	074021HPTH003006*00	4/4/02 10:31 AM	4/5/02 9:56 AM	TOS INCORRECT
9993	074021HPTH000007*00	4/4/02 11:17 AM	4/5/02 10:07 AM	TOS INCORRECT
9993	074021HPEH000004*00	4/3/02 2:53 PM	4/4/02 1:07 PM	TOS INCORRECT
9993	074021HPEH001001*02	3/29/02 10:20 AM	3/29/02 2:02 PM	TOS INCORRECT
9993	027051HPMC000005*01	4/22/02 4:23 PM	4/24/02 5:17 PM	LTXTY REQUIRED

EXCEPTION 165 ATTACHMENT I

CC	PON * VER	LSR SENT D/T	CLR RECEIVED D/T	CLR MESSAGE
9993	027051HPMC000007*01	4/15/02 4:08 PM	4/24/02 5:18 PM	CSL AND SCG INFO MUST BE PROVIDED
9993	027051HPMC000008*01	4/22/02 4:25 PM	4/24/02 5:19 PM	LTXTY REQUIRED
9993	058931HPMC000001*00	3/22/02 10:53 AM	3/28/02 4:36 PM	LOCNUM IS INCORRECT
9993	058931HPMC000002*00	3/22/02 10:22 AM	3/29/02 5:30 PM	PER LCSC LOCNUM IS INCORRECT QUESTION 7 ON ORD DOC IS INCORRECT NUMBER OF CIRCUITS
9993	058931HPMC000003*00	3/22/02 10:22 AM	3/29/02 5:30 PM	PER LCSC LOCNUM IS INCORRECT QUESTION 7 ON ORD DOC IS INCORRECT NUMBER OF CIRCUITS
9993	058931HPMC001004*00	3/22/02 10:22 AM	3/29/02 5:30 PM	PER LCSC LOCNUM IS INCORRECT QUESTION 7 ON ORD DOC IS INCORRECT NUMBER OF CIRCUITS
9993	058931HPMC000005*00	3/22/02 10:54 AM	3/28/02 4:37 PM	LOCNUM IS INCORRECT
9993	058931HPMC000006*00	3/22/02 10:53 AM	3/28/02 4:37 PM	LOCNUM IS INCORRECT
9993	058931HPMC000007*00	3/22/02 10:22 AM	3/29/02 5:30 PM	PER LCSC LOCNUM IS INCORRECT QUESTION 7 ON ORD DOC IS INCORRECT NUMBER OF CIRCUITS
9993	058931HPMC000008*00	3/22/02 10:22 AM	3/29/02 5:30 PM	PER LCSC LOCNUM IS INCORRECT QUESTION 7 ON ORD DOC IS INCORRECT NUMBER OF CIRCUITS
9993	058931HPMC000009*00	3/22/02 10:22 AM	3/29/02 5:30 PM	PER LCSC LOCNUM IS INCORRECT QUESTION 7 ON ORD DOC IS INCORRECT NUMBER OF CIRCUITS
9993	058931HPMC000010*00	3/22/02 10:53 AM	3/28/02 4:38 PM	LOCNUM IS INCORRECT; BAN1 IS INCORRECT
9993	058931HPMC000011*00	3/22/02 10:54 AM	3/28/02 4:38 PM	LOCNUM IS INCORRECT
9993	072998HPTH000007*00	4/24/02 12:14 PM	4/24/02 6:55 PM	DSG MUST BE POPULATED ON THIS ORDER TYPE
9993	076011HPLH000020*00	4/16/02 2:11 PM	4/16/02 12:00 AM	AN INCORRECT
9993	076011HPLH000024*00	4/17/02 2:40 PM	4/17/02 12:00 AM	AN INCORRECT
9993	076011HPLH000028*00	4/22/02 2:08 AM	4/22/02 12:00 PM	AN INCORRECT
9993	018031HPLJ003060*00	4/11/02 11:23 AM	4/11/02 4:00 PM	MISSING DATA IN HUNT DETAIL SECTION
9993	100012HPMC000060*00	4/3/02 9:24 AM	4/3/02 11:00 AM	NCI AND SECNIC MISMATCH
9993	100012HPMC000061*00	4/3/02 9:16 AM	4/4/02 12:50 PM	NCI/SECNCI COMBO INVALID
9993	100012HPMC000061*00	4/3/02 9:16 AM	4/4/02 3:45 PM	PLEASE DISREGARD PREVIOUS CLARIFICATION. INCORRECT TOS
9993	100012HPMC000061*01	4/5/02 11:30 AM	4/8/02 10:40 AM	CABLEPAIR INVALID FOR 2 WIRE VG EEL WITH 1-0 MUX.
9993	100012HPMC000061*03	4/9/02 12:14 PM	4/10/02 10:43 AM	INVALID SUP, PLEASE VERIFY AND RESEND

KPMG Consulting, Inc.

5/16/2002

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EXCEPTION 165 ATTACHMENT I

CC	PON * VER	LSR SENT D/T	CLR RECEIVED D/T	CLR MESSAGE
9993	100022HPMC000060*00	4/3/02 4:59 PM	4/4/02 12:56 PM	THE NC CODE THAT YOU PROVIDED FOR THIS PON IS NOT VALID. THANKS
9993	100022HPMC000060*01	4/5/02 12:37 PM	4/5/02 4:35 PM	CFA REQUIRED FOR NC, NCI COMBINATION
9993	100022HPMC000061*00	4/3/02 5:10 PM	4/4/02 11:18 AM	TOS IS INCORRECT AND CHECK EU ADDRESS
9993	100022HPMC000061*00	4/5/02 12:45 PM	4/8/02 12:31 PM	CABLEPAIR INVALID FOR 2 WIRE VG EEL WITH 1-0 MUX.
9993	100022HPMC000061*03	4/9/02 12:52 PM	4/10/02 11:07 AM	INVALID SUP, PLEASE VERIFY AND RESEND
9993	074021HPTH002061*00	4/4/02 10:20 AM	4/4/02 10:21 AM	TOS INCORRECT
9993	015052HPTF000061*01	4/10/02 at 11:49AM	4/10/02 4:59 PM	THIS IS NOT A LISTING ACCOUTN, JB IS INVALID FOR THIS ACCOUNT.
9993	080021HPLH100060*03	4/18/02 10:14AM	4/18/02 12:00 AM	AN INCORRECT
9993	080021HPLH100061*01	4/18/02 10:09AM	4/18/02 12:00 AM	AN INCORRECT
9993	094011HPTH100060*02	4/17/02 12:05PM	4/17/02 12:05PM	CFA NOT FOUND, PLS VERIFY CFA

ATTACHMENT 28

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

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